

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA**

DEIDRA CURRY,)	Case No.:
)	
Plaintiff,)	
)	
vs.)	
)	
ASSET RECOVERY SOLUTIONS, LLC.)	COMPLAINT
)	
Defendants.)	

Plaintiff, Deidra Curry (hereinafter “Plaintiff” or “Curry”) alleges:

PRELIMINARY STATEMENT

1. This is an action for damages arising from Defendant’s violations of the Fair Debt Collections Practices Act, 15 U.S.C. §1692 *et seq.* (hereinafter “FDCPA”).

JURISDICTION AND VENUE

2. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1331.
3. Venue is proper in this district under 28 U.S.C § 1191(b).

PARTIES

4. Plaintiff is a natural person who at all relevant times has resided in Hoover, Alabama, and is a “consumer” as the phrase is defined under 15 U.S.C. §1692(a) of the FDCPA.
5. Defendant Asset Recovery Solutions, LLC. (“ARS” or “Defendant”), is a corporation that regularly conducts business in Alabama. Defendant is a “debt collector” as the phrase is defined and applied under 15 U.S.C. §1692(a) of the FDCPA in that they regularly attempt to collect on debts primarily incurred for personal, family or household purposes.

FACTUAL STATEMENT

6. On a date better known to Defendant, Plaintiff Curry allegedly incurred a debt with First Premier Bank for personal or household purposes.
7. The debt was then sold to ARS for collections.
8. In an attempt to collect the debt, Defendant sent Plaintiff a collection letter dated February 25th, 2021.
9. The letter was not sent from Defendant itself; Defendant utilized a third-party vendor to send the letter.
10. In doing so, Defendant disclosed Plaintiff's personal information to a third party in violation of the FDCPA, including the fact that Plaintiff owed a debt.

COUNT I
VIOLATION OF THE FAIR DEBT COLLECTION PRACTICES ACT
15 U.S.C. § 1692 et seq.

11. Plaintiff repeats, re-alleges, and re-asserts the allegations contained in the above paragraphs and incorporates them as if specifically set forth at length herein.
12. Defendant's actions are in violation of 15 U.S.C. § 1692c(b).

WHEREFORE, Plaintiff, Deidra Curry, respectfully requests that this Court do the following for the benefit of Plaintiff:

- A. Enter judgment against Defendant for statutory damages pursuant to the FDCPA;
- B. Award costs and reasonable attorneys' fees;
- C. Grant such other and further relief as may be just and proper.

JURY TRIAL DEMAND

Plaintiff demands a jury trial on all issues so triable.

Dated this 15th day of September, 2021

Respectfully Submitted,

/s/ Curtis R. Hussey

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